

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

BING GUAN, GO NAKAMURA, MARK
ABRAMSON, KITRA CAHANA, and ARIANA
DREHSLER,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of the U.S.
Department of Homeland Security, in his official
capacity; CHRIS MAGNUS, Commissioner of U.S.
Customs and Border Protection, in his official
capacity; TAE JOHNSON, Acting Director of U.S.
Immigration and Customs Enforcement, in his official
capacity,

Defendants.

No. 1:19-CV-6570 (PKC/MMH)

NOTICE OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD

TO: THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 1.4, Emily Child of American Civil Liberties Union Foundation of San Diego & Imperial Counties hereby moves to withdraw as counsel for Plaintiffs Bing Guan, Go Nakamura, Mark Abramson, Kitra Cahana and Ariana Drehsler in the above captioned matter. Plaintiffs remain represented by their other attorneys of record and no substitution of counsel will therefore be necessary. Please remove Emily Child from the docket as counsel of record.

Dated: August 29, 2022
San Diego, California

Respectfully submitted,
By: s/ Emily Child
Emily Child
ACLUF San Diego & Imperial Counties
P.O. Box 87131, San Diego CA 92138-7131
Telephone: 619.398.4187
echild@aclu-sdic.org
Attorney for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

BING GUAN, GO NAKAMURA, MARK
ABRAMSON, KITRA CAHANA, and ARIANA
DREHSLER,

Plaintiffs,

v.

ALEJANDRO MAYORKAS, Secretary of the U.S.
Department of Homeland Security, in his official
capacity; CHRIS MAGNUS, Commissioner of U.S.
Customs and Border Protection, in his official
capacity; TAE JOHNSON, Acting Director of U.S.
Immigration and Customs Enforcement, in his official
capacity,

Defendants.

No. 1:19-CV-6570 (PKC/MMH)

DECLARATION OF EMILY CHILD PURSUANT TO LOCAL CIVIL RULE 1.4

I, Emily Child, respectfully declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a legal fellow/staff attorney employed by the ACLU Foundation of San Diego & Imperial Counties. I have served in this capacity since October 2020. I am licensed to practice law by the State of California.
2. I have been attorney-of-record in this case since this Court granted my pro hac vice application on March 15, 2021.
3. The procedural posture of the case is as follows: the parties are in the midst of discovery, which is governed by the Court's Scheduling Order of December 17, 2021 (Dkt. #70).
4. I am moving to withdraw as counsel for the plaintiffs in this case because I am ending

my employment at the ACLU Foundation of San Diego & Imperial Counties,
effective September 2, 2022.

5. My departure from the ACLU Foundation of San Diego & Imperial Counties provides a satisfactory reason for, and requires, my withdrawal as an attorney in this case. My colleague Esha Bhandari has served as co-counsel in this case from the beginning and will continue as counsel for Plaintiffs in this action. Ms. Bhandari will capably represent Plaintiffs' interests in the future.
6. Since this is a government case, there is no retaining or charging lien involved.

Dated: August 29, 2022
San Diego, California

Respectfully submitted,
By: s/ Emily Child
Emily Child
ACLUF San Diego & Imperial Counties
P.O. Box 87131, San Diego CA 92138-7131
Telephone: 619.398.4187
echild@aclu-sdic.org
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that true and correct copies of the foregoing **Notice of Motion to Withdraw as Attorney of Record by Emily Child** were filed electronically on August 29, 2022, with the United States District Court for the Eastern District of New York.

Notice of this filing will be sent via electronic mail to all parties who have entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing system.

Dated: August 29, 2022
San Diego, California

Respectfully submitted,
By: s/Emily Child
Emily Child
ACLUF San Diego & Imperial Counties
P.O. Box 87131, San Diego CA 92138-7131
Telephone: 619.398.4187
echild@aclu-sdic.org
Attorney for Plaintiffs